IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

IN RE:	§	Case No. 22-60020
	§	
INFOW, LLC, et al.,	§	Chapter 11 (Subchapter V)
	§	-
$\mathrm{Debtors}^{\scriptscriptstyle 1}$	§	Jointly Administered

EXHIBIT B

 $^{^{\}scriptscriptstyle 1}$ The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are as follows: InfoW, LLC f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

UNITED STATES BANKRUPTCY COURT DISTRICT OF CONNECTICUT BRIDGEPORT DIVISION

ERICA LAFFERTY; DAVID WHEELER; FRANCINE WHEELER; JACQUELINE BARDEN; MARK BARDEN; NICOLE ADV. PROC. NO. 22-05004 HOCKLEY: IAN HOCKLEY: JENNIFER HENSEL; JEREMY RICHMAN; DONNA SOTO: CARLEE SOTO-PARISI: CARLOS May 3, 2022 M. SOTO; JILLIAN SOTO; AND WILLIAM ALDENBERG, Plaintiffs, ٧. ALEX EMRIC JONES; INFOWARS, LLC; FREE SPEECH SYSTEMS, LLC; INFOWARS HEALTH, LLC: PRISON PLANET TV, LLC; WOLFGANG HALBIG; CORY T. SKLANKA; GENESIS COMMUNICATIONS NETWORK, INC.: and MIDAS RESOURCES, INC., Defendants.

OBJECTION AND NOTICE OF INTENTION TO FILE A MORE PARTICULAR RESPONSE TO THE NOTICE OF VOLUNTARY DISMISSAL BY THE PLAINTIFFS

Defendants InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC (the "<u>Debtors</u>"), hereby file this Notice of Objection and Notice of Intention To File A More Particular Response to the Plaintiffs' notice of voluntary dismissal, as follows:

 Debtors, as Defendants in this Adversary Proceeding, deny that a dismissal pursuant to Rule 9041 is proper and is not an automatic dismissal binding on this Court. Case(22:6500400000c 09curilent 05/03/22ledEnteredE05/03/22061/1243 (54ge Page 02 of 3

2. Debtors, as Defendants in this Adversary Proceeding, intend to file a more

particular response containing the factual and legal bases for this objection

prompertly and request an opportunity, on notice to all parties, to present this

objection to the Court for consideration.

3. Significant and unnecessary costs and expenses will be incurred, as well as

significant confusion regarding the Court's otherwise unquestionable

jurisdiction over these Debtors as Defendants in the removed Adversary

Proceding if the Plaintiffs, without this Court's order or guidance, attempt to

invoke the jursidction of the state court notwithstanding all of the pending

matters before the Court and those pending in the "home" Court in Texas.

Thus, the Debtors respectfully request the above relief and an opportunity to be

heard on the Plaintiffs' pleadings, and for such other and further relief to which the Debtors

may be justly entitled at law and in equity.

Date: May 3, 2022

Respectfully Submitted,

DEFENDANTS AND DEBTORS, INFOW, LLC IWHEALTH, LLC PRISON PLANET, LLC

By: <u>/s/ Cameron L. Atkinson /s/</u> Cameron L. Atkinson (ct31219) PATTIS & SMITH, LLC

383 Orange Street
New Haven, CT 06511

V: 203-393-3017 F: 203-393-9745

catkinson@pattisandsmith.com

2

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing document was served by U.S.P.S. and, where indicated, email on the following parties:

Attn: Eric Goldstein, Jessica M. Signor Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06013 egoldstein@goodwin.com jsignor@goodwin.com

Attn: Alinor C. Sterlin, Christopher Mattei, Matthew Blumenthal Koskoff Koskoff & Bieder 350 Fairfield Avenue Bridgeport, CT 06604 asterling@koskoff.com cmattei@koskoff.com mblumenthal@koskoff.com

Attn: Kyung Lee, R. J. Shannon Parkins Lee & Rubio LLP 700 Milam Street STE 1300 klee@parkinslee.com rishannon@parkinslee.com

Attn: Eric Henzy Zeisler & Zeisler P.C. 10 Middle Street, 15th Floor Bridgeport, CT 06604 ehenzy@zeislaw.com Attn: Mario Kenneth Cerame Brignole & Bush LLC 73 Wasworth Street Hartford, CT 06106 mcerame@brignole.com

Jordan & Ortiz, P.C. 500 N. Shoreline Blvd. Suite 900 Corpus Christi, Texas 78401 sjordan@jhwclaw.com

Attn: Ray Bataglia Law Office of Ray Battaglia, PLLC 66 Granburg Circle San Antonio, TX rbattaglialaw@outlook.com

Genesis Communications Network, Inc. Attn. Officer, Managing Agent or Agent for Service 190 Cobblestone Lane Burnsville, MN 55337

/s/Cameron L. Atkinson

Cameron L. Atkinson

UNITED STATES BANKRUPTCY COURT DISTRICT OF CONNECTICUT BRIDGEPORT DIVISION

AND LIAM CUEDI ACII)
WILLIAM SHERLACH,) }
Plaintiffs,	ADV. PROC. NO. 22-05005
V. ALEX EMRIC JONES; INFOWARS, LLC; FREE SPEECH SYSTEMS, LLC; INFOWARS HEALTH, LLC; PRISON PLANET TV, LLC; WOLFGANG HALBIG; CORY T. SKLANKA; GENESIS COMMUNICATIONS NETWORK, INC.; and MIDAS RESOURCES, INC.,)) May 3, 2022))))))
Defendants.))))))

OBJECTION AND NOTICE OF INTENTION TO FILE A MORE PARTICULAR RESPONSE TO THE NOTICE OF VOLUNTARY DISMISSAL BY THE PLAINTIFFS

Defendants InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC (the "<u>Debtors</u>"), hereby file this Notice of Objection and Notice of Intention To File A More Particular Response to the Plaintiffs' notice of voluntary dismissal, as follows:

 Debtors, as Defendants in this Adversary Proceeding, deny that a dismissal pursuant to Rule 9041 is proper and is not an automatic dismissal binding on this Court. Case(22s-05000500 Doc D6curilent 05/03/22ledEnteredE05/06/22/261248F56ge (Page02 of 3

2. Debtors, as Defendants in this Adversary Proceeding, intend to file a more

particular response containing the factual and legal bases for this objection

prompertly and request an opportunity, on notice to all parties, to present this

objection to the Court for consideration.

3. Significant and unnecessary costs and expenses will be incurred, as well as

significant confusion regarding the Court's otherwise unquestionable

jurisdiction over these Debtors as Defendants in the removed Adversary

Proceding if the Plaintiffs, without this Court's order or guidance, attempt to

invoke the jursidction of the state court notwithstanding all of the pending

matters before the Court and those pending in the "home" Court in Texas.

Thus, the Debtors respectfully request the above relief and an opportunity to be

heard on the Plaintiffs' pleadings, and for such other and further relief to which the Debtors

may be justly entitled at law and in equity.

Date: May 3, 2022

Respectfully Submitted,

DEFENDANTS AND DEBTORS, INFOW, LLC IWHEALTH, LLC PRISON PLANET, LLC

By: <u>/s/ Cameron L. Atkinson /s/</u> Cameron L. Atkinson (ct31219)

PATTIS & SMITH, LLC 383 Orange Street New Haven, CT 06511

V: 203-393-3017

F: 203-393-9745

catkinson@pattisandsmith.com

2

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing document was served by U.S.P.S. and, where indicated, email on the following parties:

Attn: Eric Goldstein, Jessica M. Signor Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06013 egoldstein@goodwin.com isignor@goodwin.com

Attn: Alinor C. Sterlin, Christopher Mattei, Matthew Blumenthal Koskoff Koskoff & Bieder 350 Fairfield Avenue Bridgeport, CT 06604 asterling@koskoff.com cmattei@koskoff.com mblumenthal@koskoff.com

Attn: Kyung Lee, R. J. Shannon Parkins Lee & Rubio LLP 700 Milam Street STE 1300 klee@parkinslee.com rjshannon@parkinslee.com

Attn: Eric Henzy Zeisler & Zeisler P.C. 10 Middle Street, 15th Floor Bridgeport, CT 06604 ehenzy@zeislaw.com Attn: Mario Kenneth Cerame Brignole & Bush LLC 73 Wasworth Street Hartford, CT 06106 mcerame@brignole.com

Jordan & Ortiz, P.C. 500 N. Shoreline Blvd. Suite 900 Corpus Christi, Texas 78401 sjordan@jhwclaw.com

Attn: Ray Bataglia Law Office of Ray Battaglia, PLLC 66 Granburg Circle San Antonio, TX rbattaglialaw@outlook.com

Genesis Communications Network, Inc. Attn. Officer, Managing Agent or Agent for Service 190 Cobblestone Lane Burnsville, MN 55337

/s/Cameron L. Atkinson

Cameron L. Atkinson

UNITED STATES BANKRUPTCY COURT DISTRICT OF CONNECTICUT BRIDGEPORT DIVISION

WILLIAM SHERLACH & ROBERT PARKER,)
Plaintiffs,)) ADV. PROC. NO. 22-05006
ALEX EMRIC JONES; INFOWARS, LLC; FREE SPEECH SYSTEMS, LLC; INFOWARS HEALTH, LLC; PRISON PLANET TV, LLC; WOLFGANG HALBIG; CORY T. SKLANKA; GENESIS COMMUNICATIONS NETWORK, INC.; and MIDAS RESOURCES, INC.,	May 3, 2022)))))))
Defendants.)))))

OBJECTION AND NOTICE OF INTENTION TO FILE A MORE PARTICULAR RESPONSE TO THE NOTICE OF VOLUNTARY DISMISSAL BY THE PLAINTIFFS

Defendants InfoW, LLC (f/k/a Infowars, LLC), IWHealth, LLC (f/k/a Infowars Health, LLC), and Prison Planet TV, LLC (the "<u>Debtors</u>"), hereby file this Notice of Objection and Notice of Intention To File A More Particular Response to the Plaintiffs' notice of voluntary dismissal, as follows:

 Debtors, as Defendants in this Adversary Proceeding, deny that a dismissal pursuant to Rule 9041 is proper and is not an automatic dismissal binding on this Court. Case(22s-05000600 Doc D5curilent 05/03/22ledEnteredE05/06/2261/251r2:0ge Page(2 of 3

2. Debtors, as Defendants in this Adversary Proceeding, intend to file a more

particular response containing the factual and legal bases for this objection

prompertly and request an opportunity, on notice to all parties, to present this

objection to the Court for consideration.

3. Significant and unnecessary costs and expenses will be incurred, as well as

significant confusion regarding the Court's otherwise unquestionable

jurisdiction over these Debtors as Defendants in the removed Adversary

Proceding if the Plaintiffs, without this Court's order or guidance, attempt to

invoke the jursidction of the state court notwithstanding all of the pending

matters before the Court and those pending in the "home" Court in Texas.

Thus, the Debtors respectfully request the above relief and an opportunity to be

heard on the Plaintiffs' pleadings, and for such other and further relief to which the Debtors

may be justly entitled at law and in equity.

Date: May 3, 2022

Respectfully Submitted,

DEFENDANTS AND DEBTORS, INFOW, LLC IWHEALTH, LLC PRISON PLANET, LLC

By: <u>/s/ Cameron L. Atkinson /s/</u> Cameron L. Atkinson (ct31219)

PATTIS & SMITH, LLC 383 Orange Street

New Haven, CT 06511 V: 203-393-3017

F: 203-393-9745

catkinson@pattisandsmith.com

2

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing document was served by U.S.P.S. and, where indicated, email on the following parties:

Attn: Eric Goldstein, Jessica M. Signor Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06013 egoldstein@goodwin.com jsignor@goodwin.com

Attn: Alinor C. Sterlin, Christopher Mattei, Matthew Blumenthal Koskoff Koskoff & Bieder 350 Fairfield Avenue Bridgeport, CT 06604 asterling@koskoff.com cmattei@koskoff.com mblumenthal@koskoff.com

Attn: Kyung Lee, R. J. Shannon Parkins Lee & Rubio LLP 700 Milam Street STE 1300 klee@parkinslee.com rishannon@parkinslee.com

Attn: Eric Henzy Zeisler & Zeisler P.C. 10 Middle Street, 15th Floor Bridgeport, CT 06604 ehenzy@zeislaw.com Attn: Mario Kenneth Cerame Brignole & Bush LLC 73 Wasworth Street Hartford, CT 06106 mcerame@brignole.com

Jordan & Ortiz, P.C. 500 N. Shoreline Blvd. Suite 900 Corpus Christi, Texas 78401 sjordan@jhwclaw.com

Attn: Ray Bataglia Law Office of Ray Battaglia, PLLC 66 Granburg Circle San Antonio, TX rbattaglialaw@outlook.com

Genesis Communications Network, Inc. Attn. Officer, Managing Agent or Agent for Service 190 Cobblestone Lane Burnsville, MN 55337

<u>/s/Cameron L. Atkinson</u>

Cameron L. Atkinson